



Environmental Protection Agency

1701 First Avenue, Maywood, IL. 60153

Copy for K. Bechely

(312) 345-9780

Refer to: Escast, Inc. EPA #6984

March 19, 1984

Mr. Ben Laughter,
General Counsel
Escast, Inc.
30 North LaSalle Street
Chicago, Illinois 60602

Dear Mr. Laughter:

I am sorry that I have been unable to follow-up my phone call with a more immediate written response to your letter of February 10, 1984. I took longer than expected to recuperate from surgery done on February 17, 1984.

However, I have now had the time to discuss your letter and the results of the Agency inspection at Escast done on Thursday, February 9, 1984, (mentioned in your letter) with Ted Denning, Regional Manager of Water Pollution Control Field Operations and Ken Bechely, Regional Manager of Land Pollution Control Field Operations. This letter will speak to both Water and Land Division concerns.

My letter of February 2, 1984 listed eleven RCRA hazardous wastes which had been found in an Agency grab sample of Escast's process water discharge from the "pit." Escast, at our meeting on February 7, 1984, identified one, 1-1-1 Tri-Chloro-ethane, as being used in their manufacturing process. This chemical, along with ethyl alcohol, was a constituent of a rinse used by Escast.

The method by which 1-1-1 Tri-Chloro-ethane reached the pit was the discarding of the used rinse solution by Escast into the pit. At the meeting, we were told that Mr. Brown's memo, attached to your February 10 letter, and also given to us at the February 7 meeting, referred to the cessation of this method of discarding the rinse solution.

The concern of the Division of Water Pollution Control ("DWPC") is that hazardous wastes are being discharged to waters of the State of Illinois and the continuation of a discharge with high BOD in violation of the terms of Escast's NPDES permit. As stated in

EPA Region 5 Records Ctr.



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your letter, the discharge point from the pit has been sealed. This was verified by our inspectors at their plant inspection on February 9, 1984. Escast states that it intends to convert the process which formerly discharged to the pit to a recycling system. I therefore request the name of the consulting firm chosen to handle the project, a copy of the consultant's report, both preliminary and final, including engineering drawings, and a reasonable approximate date by which such conversion will be complete.

The focus of the concerns of the Division of Land Pollution Control ("DLPC") is somewhat different. Under the RCRA Regulations, Illinois Pollution Control Board Regulations and the Illinois Environmental Protection Act, dumping of the rinse mixture of 1-1-1 Tri-chloro-ethane, ethyl alcohol and water into the pit constituted open dumping of wastes, and on-site disposal of hazardous wastes. This act would subject Escast to all the requirements of 35 Illinois Administrative Code 724 and 725 (IPCB Regs.) and 40 CFR 266 and 122, and further means that Escast has violated applicable portions of these Regulations. (Copy enclosed.)

DLPC, as stated in our meeting, is requesting a clean out of the pit in which these substances were dumped and you state in your letter that this will be done. I request a statement of a reasonable date by which the pit clean out will commence and conclude. I also request a copy of the correspondence regarding the proposed clean out with the disposal facility contacted and a copy of the contract for the job. Lastly, although I realize a copy of the analyses made of the sand samples will be sent to the Land Permits Section to obtain the proper disposal permits, I ask that a copy be sent directly to me also. I also want a copy of your closure plan.

Storage of rinses and wax sludge containing these or any other listed or identified RCRA hazardous wastes for any period of time subjects Escast to various RCRA and IPCB Requirements. If storage is less than 90 days 35 Ill. Adm. Code 725.116, and Subparts C&D of 725 apply. If storage is longer than 90 days then 35 Ill. Adm. Code 724 and 725 are applicable (see also 35 Ill. Admin. Code 722.134).

Lastly, as regards the sand previously taken from the pit and used as fill on the property, if levels of 1-1-1 Tri-chloro-ethane are sufficiently elevated DLPC will require a complete excavation of this material. Such a project will necessitate filing of a closure plan and perhaps post-closure monitoring pursuant to 35 Ill. Admin. Code. 725.

I ask that your sample results be sent to me as soon as received and I will forward ours to you when they are available.

For DWPC I request a copy of the analysis run on the contents of the "inside retaining area" for BOD, pH and organics as mentioned in your letter.

Finally, regarding the discharge point. There is an additional problem. During our February inspection, our inspector found another discharge stream entering the manhole besides the pit discharge stream, which at that time was not flowing. Mr. Brown, the plant manager, identified this stream as mixed "cooling water" from Escast and land run-off from Escast property. He gave our inspector a diagram of the plant discharges and said that the discharge we found was shown by the line I have traced in red pen. Mr. Brown was told that this discharge must have an NPDES permit, which it does not, and replied "you need a permit for that?" Escast is currently in violation of Section 12, a, b, c, d and f of the Illinois Environmental Protection Act and related IPCB water regulations for discharging without an NPDES permit.

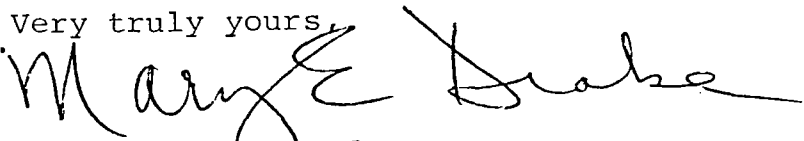
Also, there is a further problem with this discharge in that the BOD levels were elevated. Our samples show levels of 341 and 153 mg/l. This is excess of levels which could be allowed under a NPDES permit. An analysis sheet is attached per your request.

In reviewing the entire situation I can say that the only way the Agency can justify not proceeding with an enforcement action at once is if we continue to receive the complete and prompt cooperation of Escast in dealing with these violations. Further, these violations must be corrected and Escast must be in full compliance with the Act and the Regulations within a reasonable period of time.

If you have any questions concerning any of these matters, please contact me directly. I appreciate the promptness of your letter of response following our February 9, 1984 meeting and request a similar prompt response to this letter so that we can continue to evaluate the situation.

I also suggest that you and I arrange to meet at the Escast Addison plant for a tour of the premises at a mutually acceptable time in the not too distant future, accompanied by persons from Escast and from my Agency who are familiar with the plant premises and processes to determine if all these matters have been dealt with to the satisfaction of our clients.

Very truly yours,



Mary E. Drake, Enforcement
Staff Attorney

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